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October 31, 2022

**VIA ECF**

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15D  
New York, New York 10007

Re: *Tieu v. N.Y.C. Economic Development Corp., et al.*  
Case No.: 1-21-cv-05951 (AT)

Dear Judge Torres:

We represent the defendants in the above-referenced matter and write, with plaintiff's consent, to respectfully request an extension of time to file a letter-motion for a pre-motion conference prior to filing a motion for summary judgment.

The current deadline to file a pre-motion letter is November 4, 2022, fourteen (14) days following the close of fact discovery on October 21, 2022. The reason for the requested extension is that, pursuant to Your Honor's Individual Rules, defendants must provide plaintiff a Rule 56.1 Statement of Material Facts (the "Rule 56.1 Statement"), allow time for plaintiff to respond, and subsequently submit their request for a pre-motion conference together with a copy of plaintiff's response to the Rule 56.1 Statement. Due to scheduling accommodations needed to conduct ten (10) depositions in this case, six (6) depositions were conducted within the past month, and the final two (2) depositions occurred on October 18 and 20, 2022. The parties still have not received transcripts of the last two (2) depositions. Additionally, more than 6,000 pages of documents were produced in discovery, some of which were produced on October 20, 2022.

The parties respectfully propose the following schedule: defendants' Rule 56.1 Statement to be provided to plaintiff by December 6, 2022; plaintiff's response to the Rule 56.1 Statement to be provided to defendants by December 21, 2022; defendants' letter-motion for a pre-motion conference to be submitted by January 6, 2023.

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This is defendants' second request for an extension of time to submit a request for a pre-motion conference. The first request, which was granted, was submitted based upon Magistrate Judge Cave's order extending the fact discovery deadline to October 21, 2022.

We thank the Court for its consideration of this request.

Respectfully,

GORDON REES SCULLY  
MANSUKHANI, LLP

*Lindsey Blackwell*

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Lindsey Blackwell

GRANTED.

SO ORDERED.

Dated: November 1, 2022  
New York, New York



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ANALISA TORRES  
United States District Judge